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July 8, 2005

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C St. SW Washington, DC 20204

Pharmavite Reference: 1137S20AA

Dear Sir or Madam:

Pursuant to Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act and Section 101.93 of FDA's regulations, we hereby notify you that we are using the following statement(s):

- Name and address of manufacturer: **(1)** Pharmavite LLC, PO Box 9606, Mission Hills, CA 91346
- **(2)** Text of the statement(s):

OsteoRenewTM Ultra

Bone Strengther

Strengthens Bones Naturally

Boron: Mineral important for skeletal development and maintaining strong bones.

BoneForceTM: A HealthSolutions blend of B vitamins which may reduce

homocysteine levels and support bone health.

(3) Name of the dietary ingredient(s):

Vitamin C

Vitamin D

Vitamin E

Vitamin K

Vitamin B 6

Folic Acid

Vitamin B12

Calcium

Phosphorus

Magnesium

Zinc

Copper

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Manganese

Boron

(4) Name of the dietary supplement(s):
OsteoRenew or products containing the above ingredients as a single ingredient or in combination with other ingredients

The above statement(s) may be used in one or more of the following brands of products: B.J.'s Wholesale, Kirkland Signature, Nature Made, Nature's Resource, Nutri Plus, Olay, Spring Valley, Target, TruNature, Walgreens.

We certify the information in this notice is complete and accurate, and we have substantiation that the above statement(s) is truthful and not misleading.

Sincerely,

David Kropp

Director, Regulatory Affairs

cc. P. Bolar